

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	MASTER DOCKET
In re PARMALAT SECURITIES LITIGATION	:	04 MD 1653 (LAK)
	:	ECF Case
This document relates to: All Cases	:	
	:	
—	X	

DECLARATION OF MICHAEL J. DELL

I, Michael J. Dell, hereby declare as follows:

1. I am a member of the bar of the State of New York and of this Court, and am a member of the law firm of Kramer Levin Naftalis & Frankel LLP, attorneys for defendant Deloitte Touche Tohmatsu ("DTT"). I respectfully submit this declaration to present to the Court the following exhibits referred to in DTT's Response to Dr. Bondi's Motion for a Protective Order Regarding His Expert Witnesses.

2. Annexed hereto are true and correct copies of the following:

Exhibit 1	Excerpt from deposition of Stefania Chiaruttini, dated October 12, 2006
Exhibit 2	Excerpt from deposition of Oliver Galea, dated March 3, 2007
Exhibit 3	Excerpt from deposition of Roberto Megna, dated February 28, 2007
Exhibit 4	Excerpt from deposition of Franco Lagro, dated February 27, 2007
Exhibit 5	James J. Sabella's May 24, 2007 letter to me.
Exhibit 6	Stephen M. Craig's June 8, 2007 letter to me

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 13, 2007

New York, New York

/s/ Michael J. Dell

Michael J. Dell